



CHRIN BROTHERS, INC.

September 26, 2011

Mr. William Tomayko
PA DEP, Bureau of Waste Management
2 Public Square
Wilkes-Barre, PA 18711

Re: Nuisance Minimization and Control Plan Submission – Consent Order & Agreement

Dear Mr. Tomayko:

Enclosed please find an updated Nuisance Minimization and Control Plan for Chrin Brothers Landfill. The NMCP is being submitted in accordance with paragraph 3.a. of the Consent Order and Agreement executed on September 19, 2011.

Please do not hesitate to contact me should you have any questions. Thank you.

Respectfully Submitted,

Joseph R. Klobusicky
Chrin Landfill

cc: Greg Chrin
David Brooman

Encl.

EXHIBIT 14-1.3
NUISANCE MINIMIZATION AND CONTROL PLAN

**NUISANCE MINIMIZATION AND CONTROL PLAN
(Continued)**

EXHIBIT 14-1.3

NUISANCE MINIMIZATION AND CONTROL PLAN

INTRODUCTION

This attachment presents nuisance minimization and control information related to waste disposal activities at the Chrin Brothers Sanitary Landfill. The landfill facility will be operated to prevent conditions that may be harmful to the public health or the environment. The conditions to be controlled include: litter, vectors, odors, dust, noise, and unsightliness. The landfill manager will implement the nuisance minimization and control plan and follow the guidelines as stated herein. Employee training will include all aspects of this nuisance minimization and control plan.

APPENDIX A to this plan is the Chrin Brothers Sanitary Landfill Organizational Flow Chart. APPENDIX B is the Notification List identifying those individuals, contractors, and agencies to be notified in the event of significant odor issues, flare outages, and/or spills and other emergencies.

NUISANCE MINIMIZATION AND CONTROL PLAN (Continued)

1.0 INVENTORY OF POTENTIAL NUISANCES

This section of the nuisance minimization and control plan identifies and describes the following conditions associated with day-to-day landfill operations that have the potential to create a nuisance – litter, vectors, odors, dust, and noise. Each of these potential nuisances is addressed in detail below.

1.1 Litter

The landfill only accepts municipal, construction and demolition (C&D), and approved residual wastes. These waste streams contain various items, including paper and lightweight waste, which may be susceptible to blowing and creating litter. Litter can be generated at any point in the waste management process, including collection, transportation, and disposal in the landfill. Chrin has limited ability to minimize and control littering during the collection and transportation of waste to the landfill. Litter can be generated from two primary sources:

- Waste escaping from collection vehicles as they drive to or from the landfill (resulting in off-site litter); and
- Waste being blown from the working face of the landfill (potentially resulting in off-site litter).

1.2 Vectors

The landfill accepts municipal wastes, which consist largely of organic materials that could possibly provide a food source for vectors. Vectors that could potentially frequent the landfill would include rodents, birds, wild animals, and mosquitoes. Sources that could harbor these vectors would include:

- The Working Face; and
- Sedimentation Basins/Stormwater Control Features.

1.3 Odors

Odors can be generated at any point in the municipal waste management process, from the time waste is collected, to the time the waste arrives at the landfill for disposal, and beyond. Odor is a potential harm all landfills must address, regardless of waste type. Although the potential for harms due to odor is low, Chrin has identified several possible sources or methods by which odor can be generated off-site or on-site. These include:

- Odor generated in localized collection and long-haul vehicles (transportation);
- Vehicle emissions;
- Odor from the working face; and
- Odor from decomposition of waste.

NUISANCE MINIMIZATION AND CONTROL PLAN (Continued)

1.4 Dust

Dust is a recognized potential nuisance associated with landfill operation. Dust can be generated by a number of sources, including:

- Truck traffic on paved roads;
- Truck traffic on unpaved roads;
- Rock crushing operations;
- Operation of landfill equipment to place and cover waste; and
- Development of borrow sources.

1.5 Noise

Noise is a recognized potential nuisance associated with landfill operation. Noise can be generated by a number of sources, including:

- Truck traffic associated with delivering waste to the facility; and
- By equipment used for daily landfill operations and construction.

NUISANCE MINIMIZATION AND CONTROL PLAN
(Continued)

**2.0 DESCRIPTION OF MONITORING
AND RESPONSE ACTIVITIES FOR POTENTIAL NUISANCES**

This section describes the monitoring and response activities for potential nuisances at the Chrin Brothers Sanitary Landfill. For further details, please refer to Table 1, Nuisance Monitoring Schedule, and Table 2, Nuisance Response Options attached to this Nuisance Minimization and Control Plan which are incorporated herein by reference.

2.1 Litter

Litter is one of the major nuisances associated with the operation of a sanitary landfill. The use of proper operational procedures and implementation of the litter control plan will reduce the possible spread of litter to the surrounding area. The landfill supervisor is responsible for training landfill employees and implementation of the litter control plan. The first line of litter control is the individual employee's involvement in the plan. Employees are expected to police their work areas and respond with appropriate and necessary measures to control a situation where the possible release of litter or debris to the environment is imminent.

Mitigative operational procedures include: 1) keeping the working face of the landfill as small as possible; 2) prompt placement of daily and intermediate cover to prevent blowing litter; 3) the immediate working area of the landfill will be surrounded by snow fences, mesh, or other Department of Environmental Protection (DEP) approved material; and 4) the area downwind will have at a minimum one row of catch fencing; the fencing will be moved as required to keep pace with the operating area. The perimeter (6-foot) fence surrounding the landfill facility will act as a final barrier to prevent the spread of litter across property lines.

In order to control litter, landfill personnel will police the landfill, catch and perimeter fences, and the access roads at a minimum, one time a week. The landfill supervisor will increase the policing frequency as required to control the spread of litter. Litter falling from vehicles entering or exiting the landfill facility will be controlled by the use of tarps on open-top roll-offs and transfer trailers. Disposal trucks will be required to compact their loads to prevent debris from falling out of the loading bin while en route to the landfill facility. As needed, the operator may spray limited quantities of water, low contact precipitation, or up to 3,000 gallons of leachate per day onto the working area to control blowing litter prior to and during compaction.

2.2 Vectors

Proper operational procedures and placement of daily, intermediate, and final cover according to approved Department thickness will minimize the attraction and breeding of vectors. Inspections by the landfill manager and observations by landfill personnel will determine if additional corrective action is required to control vectors. If deemed necessary, Chrin will contract with a licensed extermination service to curb any vector problem.

NUISANCE MINIMIZATION AND CONTROL PLAN (Continued)

2.3 Odors

The implementation and enforcement of proper engineering and operational measures will control and minimize the generation of odors both onsite and offsite. Chrin's primary system for controlling odors is the active landfill gas collection and control system. As of the date of this plan, the system consists of more than 200 extraction wells, a network of approximately 8 miles of header and lateral pipes, and three flares with associated blowers. To monitor, maintain and upgrade the system as needed, Chrin employs a dedicated gas crew and maintains contracts with experienced environmental and engineering consultants. In addition, Chrin employs various odor control measures to minimize garbage, landfill gas, and leachate odors, including routine odor patrols, vehicle inspections for proper tarping and cleanout, and the use of deodorizing misters. Proper placement of daily cover is also used to minimize odors emanating from the landfill. Leachate seep monitoring and control will mitigate the odors attributed to leachate. Open burning will not be permitted at the landfill facility.

2.4 Dust

The operational plan calls for daily control of mud and dust on the access and landfill roads. The paved access roads will be routinely cleaned during the day with the sweeper vehicle. The water tank truck will apply water and if required DEP approved dust suppressants to the landfill roads to minimize fugitive dust generation. A section of the access road will be large size aggregate and will be used by trucks discharging at the facility, thus reducing the tracking of mud and other debris from the landfill. A speed limit of 15 mph will be imposed on all vehicles on the site. The revegetation of the landfill slopes will minimize dust generation during wind storms.

2.5 Noise

The preventive maintenance program at the landfill will ensure all landfill equipment and vehicles are equipped with the proper muffler systems and functioning properly as specified by the manufacturer. The speed limit at the facility will be 15 mph. All landfill personnel are trained to operate facility vehicles according to the manufacturers' operating instructions.

NUISANCE MINIMIZATION AND CONTROL PLAN
(Continued)

3.0 METEOROLOGICAL MONITORING PROGRAM

Meteorological monitoring will be conducted at this facility in accordance with the approved Form 54 – Background Meteorological Monitoring. Refer to Form 54 for a description of the meteorological monitoring program.

NUISANCE MINIMIZATION AND CONTROL PLAN
(Continued)

4.0 PREVENTATIVE MAINTENANCE AND NUISANCE CONTROLS

INTRODUCTION

4.1 Litter

4.1.1 Litter Generated from Vehicles

Litter generated by inbound vehicles is often related to inappropriate tarping of the waste. As of July 2001, Chrin Landfill began implementing a mandatory Waste Hauler Safety and Compliance Assistance Program. This program has been developed to help transporters and Chrin Landfill maintain compliance with various regulatory requirements, including the prevention and mitigation of litter. Information related to the program is provided in Appendix A of the Harms and Benefits Evaluation. As part of the Waste Hauler Safety and Compliance Assistance Program, and to mitigate litter-related concerns, Chrin will visually observe waste vehicles en route to the facility and enforce the secure tarping of vehicles. Chrin Landfill scale house employees observe all incoming and outbound trucks to be sure they are properly tarped. Drivers are notified immediately if this condition does not exist. Further, vehicles will be subject to random inspections in accordance with the protocol outlined in the Waste Hauler Safety and Compliance Assistance Program. Chronic violators (more than two violations of the Waste Hauler Safety and Compliance Assistance Program) are subject to a response action by Chrin Landfill and may be prevented from entering Chrin Landfill until the unit is brought into compliance.

To further mitigate litter, Chrin will require all drivers to shovel and sweep the interiors of their vehicles to remove waste remaining in the bodies prior to exiting the working face. This prevents waste from becoming trapped in the vehicle and becoming a source of future litter once the vehicle exits the facility.

4.1.2 Litter Generated at the Working Face

Chrin will mitigate blowing litter generated at the working face by incorporating a litter control program into its daily operations of the Landfill. On windy days, this program will consist of maintaining a small working face, attempting to situate the working face to take advantage of surrounding topography (including previously placed and covered adjacent waste masses) to limit direct exposure to wind, regulating the number of vehicles discharging at a particular time so that compaction can be applied as quickly as possible, and situating portable and permanent litter fences downwind of the working face. If these measures are not completely effective, Chrin may apply daily cover material throughout the day to limit the area of exposed waste. In such a circumstance, daily cover material placement would also be staged, generally starting before noon, and continuing throughout the afternoon, closely following behind the active working face. In this manner, the exposed surface of fresh waste would be minimized to the extent practical. In extreme cases of high winds, Chrin Landfill will close and cease waste disposal operations until high winds have subsided.

NUISANCE MINIMIZATION AND CONTROL PLAN (Continued)

In addition to the above proactive mitigation measures, Chrin Landfill personnel also inspect the entire facility and perimeter at least weekly to identify and collect litter. This frequency is increased when weather conditions dictate. Additionally, Chrin Landfill collects litter along Industrial Drive between its intersections with Morgan Hill Road to the east and Morvale Road to the west.

4.2 Vectors

Vector mitigation at the working face will consist of maintaining as small a working face as possible and, consistent with Chrin's odor control program, covering organic waste that could provide food sources for vectors. Further, areas that achieve long-term intermediate grades will be covered with at least 12 inches of cover soil. In addition, shortly following the completion of filling in each cell Chrin will install the final cover system over portions of the waste mass that have achieved final permitted waste grade, completely eliminating underlying waste as a potential food source. These proactive measures will essentially eliminate the waste as a food source for birds and larger animals.

To mitigate vector infestation associated with mosquitoes and flies, the landfill area and its support facilities will be graded to minimize or eliminate standing water. Water that collects in the sedimentation basins will be infiltrated and/or discharged within a short time period through principal spillway dewatering devices, such that water levels in these basins will rarely be constant.

Chrin Landfill currently uses, and will continue to employ, sound environmental management practices to prevent vector infestation and intrusion. Furthermore, a licensed exterminator regularly inspects the landfill and eliminates vectors if they are detected. These practices have proven extremely effective at mitigating vector nuisances.

4.3 Odors

4.3.1 Offsite Odors Generally

On each operating day, Chrin shall perform two daily odor patrols around the perimeter of the landfill. The first patrol shall be performed between the hours of 6:00am and 9:00am. The second patrol will be performed following the application of the daily cover. The odor patrol follows the route as shown in APPENDIX C and includes the following monitoring points:

- a) Main Chrin Landfill Entrance at Industrial Drive
- b) Intersection of Industrial Drive and Morgan Hill Road
- c) Morgan Hill Road Switchback Curve
- d) Spring Valley Road
- e) Waltman Loop Lane
- f) Morvale Road
- g) Intersection of Morvale Road and Industrial Drive
- h) Chrin Landfill Maintenance Gate at Industrial Drive
- i) Additional areas as deemed necessary to investigate the source of any odor observed.

NUISANCE MINIMIZATION AND CONTROL PLAN
(Continued)

Chrin will maintain onsite a log of its odor patrols and shall make it available for review by Department personnel upon request. The odor patrol log, a copy of which is attached hereto as APPENDIX D, contains the following information:

- a) name of the Chrin representative performing the patrol;
- b) the date;
- c) time patrol started and ended;
- d) current weather conditions, including wind direction, at the landfill;
- e) the location/name of the monitoring point; and
- f) odor, if any, plus strength, description, and duration of any odor detected.

In the event an offsite odor from the landfill is identified during an odor patrol, Chrin shall immediately document the odor and investigate its source. A report shall be prepared promptly after concluding the investigation which summarizes the findings and follow up of the investigation, including any remedial measures and their effectiveness. A copy of the report shall be maintained onsite as part of the landfill's daily operating record and shall be made available for review by Department personnel upon request.

4.3.2 Odors Generated En Route from Vehicles

Odors associated with vehicles en route to the facility are most often related to leaking or damaged transport equipment. To mitigate this odor-related concern, Chrin shall visually observe waste vehicles en route to the facility and enforce proper maintenance of transport equipment. Chrin requires all waste hauling vehicles to be leak free. As part of its Waste Hauler Safety and Compliance Assistance Program, Chrin personnel shall periodically inspect vehicles to verify that truck bodies and roll-off boxes have no leaks or holes.

Once vehicles have discharged their load at the working face, drivers will be required to shovel and sweep the interiors of their vehicles to remove any waste remaining in the bodies prior to exiting the working face. This prevents waste from becoming trapped in a vehicle and becoming a potential source of future odor after that vehicle exits the facility. Working face personnel shall visually evaluate the vehicle and shall periodically visually spot check trucks as they exit the working face.

Chrin employees shall, as part of the Waste Hauler Safety and Compliance Assistance Program, periodically monitor waste vehicle traffic to and from the landfill and shall include in their routine observations an evaluation of the condition of the vehicles, including odor. If objectionable odors are detected, the responsible hauling company/customer will be contacted to determine if the source of the odor can be identified and measures will be discussed with the hauler to minimize the potential for future odor. These measures might include more frequent collections to minimize decomposition of the waste prior to disposal. Chrin will also work with waste generators to identify sources of particularly offensive odors. In these instances, the generator may be requested to evaluate changing the waste generating process (e.g., food waste generators can be requested to solidify their wastes by mixing with paper/cafeteria waste

NUISANCE MINIMIZATION AND CONTROL PLAN
(Continued)

products). See Section 4.3.4 below for further discussion of notification to haulers and generators regarding odor control and nuisance minimization techniques.

4.3.3 Vehicle Emissions

Chrin shall implement several measures to mitigate emissions from waste vehicles en route to and from the landfill. Chrin shall randomly monitor the waste hauling vehicles along the designated approach routes for emissions. In the event excessive emissions are observed, Chrin shall visually verify that the proper operation techniques are being implemented. If they are not, Chrin shall instruct the operator on the proper procedures. Should it be determined through visual observation that excessive emissions are the result of improper planned vehicle maintenance, Chrin shall request to review the planned vehicle maintenance schedule record(s) to determine if necessary maintenance has been completed.

If Chrin personnel determine that proper operation techniques are not being implemented and planned vehicle maintenance has not been followed, the waste hauling vehicle will be denied access to the landfill until the source of the excessive emissions has been identified by the operator and/or owner and corrected.

4.3.4 Nuisance Load Management

Chrin will continue to provide information, such as a fact sheet, to educate waste haulers regarding the management of potentially odorous or nuisance loads, such as loads of sludge, slurries, other loads generated in municipal wastewater collection and treatment and food waste loads. A copy of the letter to haulers and generators regarding Chrin's Nuisance Load Management Policy and the Nuisance Load Management Fact Sheet sent by Chrin to its customers is attached hereto as APPENDIX E. As stated in the attached letter and Fact Sheet, Chrin expects generators and haulers disposing of waste at the landfill to notify the landfill prior to delivery of any potential nuisance load. Chrin further expects drivers delivering waste to notify the scale operator upon arrival if they are carrying potential nuisance loads.

Nuisance loads shall be logged in upon arrival in a log that lists the generator(s) of the load, transporter of the load, date and time of arrival, any observable odors (description of type and strength) and person's name recording the entry of the load. The log shall be maintained at the landfill and be made available to the Department upon request.

The scale house shall notify the working face of the arrival of a nuisance load, or load that could potentially be a nuisance load. Upon notification from the scale house, Chrin shall promptly construct a pit at the working face in sufficient size and dimension to contain the load. Chrin shall promptly place the nuisance load in the pit and cover the load with municipal waste and/or soil. Trucks carrying nuisance loads, or potential nuisance loads, shall be advanced in the dumping rotation at the working face in order to allow the load to be emptied and covered as soon as possible, thereby reducing the potential for offsite odors. Odor neutralizer shall be directly applied to the nuisance load. The mister truck shall be placed and operated downwind of the nuisance load.

NUISANCE MINIMIZATION AND CONTROL PLAN (Continued)

Chrin shall promptly perform a targeted nuisance inspection onsite following the dumping of a nuisance load at the working face. The person performing the inspection shall be stationed downwind of the working face. Wind direction and intensity of the odor from the nuisance load shall be noted. If odors are detected, Chrin shall monitor for odors offsite downwind of the working face. Chrin shall implement measures to control the odors and record those measures and the results to show the effectiveness of those measures. The targeted nuisance load inspection, including the time, shall be documented.

4.3.5 Odors Generated at the Working Face and from Decomposition of Waste

Once waste reaches the landfill and is deposited into the working face, Chrin shall use several proactive operating measures to mitigate odors generated from active waste disposal. The active working face shall be kept as small as possible, to minimize the area of exposed waste. Further, as necessary to control odors, daily cover material placement shall be staged, generally starting before noon and continuing throughout the afternoon, closely following behind the active working face. In this manner, rather than waiting until the end of the day to place cover, Chrin shall, if necessary, control odors emanating from the waste mass by incrementally covering the exposed surface of fresh waste throughout the day.

As noted and discussed in Section 2.3 above, Chrin's primary system for controlling odors is the active landfill gas collection and control system. Chrin shall continue to install active landfill gas (LFG) extraction wells into the waste on a relatively regular pattern throughout the waste mass. In addition, shortly following the completion of filling in each cell, Chrin shall install the final cover system over portions of the waste mass that have achieved final permitted waste grades. The final cover system will include a geomembrane and 2 feet of final cover soil, which will substantially limit the uncontrolled migration of LFG and odor away from the mass, and will help direct LFG and odor to the gas extraction wells. In this manner, uncontrolled LFG and odor migration away from the waste mass will be limited.

If an odor problem related to the waste disposal operations persists after these measures, Chrin may use odor neutralizing misters and direct application of odor neutralizers as necessary. In accordance with any applicable DEP approvals, Chrin shall apply odor neutralizer during operations at the working face as necessary and at a sufficient volume and pressure to maximize the effectiveness of the odor neutralizer and prevent or minimize odors. These operational measures will substantially mitigate odor from waste disposal operations. Other odor control measures available for use as necessary include water trucks with odor control and a utility flare.

4.3.6 Odors Detected During Onsite Construction Activities

Chrin shall perform a targeted nuisance inspection onsite as described in Section 4.3.1. above during construction activities. For purposes of this Section, "construction activities" shall mean: leachate seep repair; liner repair; gas line repair; new gas line installation; gas well repair; new gas well construction; and construction of erosion and sedimentation control facilities.

NUISANCE MINIMIZATION AND CONTROL PLAN
(Continued)

4.4 Dust

Chrin Landfill currently uses an effective mitigation plan to minimize dust generation, and this plan is outlined in detail in Form G(A) of the existing permit and is included in the landfill's Title V Air Quality Operating Permit.

Generally, the mitigation measures reduce fugitive dust emissions by reducing the quantity of dust particles on the facility's roadways, either by removal via sweeping or by watering. Chrin also uses paving as a means to mitigate dust. The entrance road into the landfill is paved from Industrial Drive to the landfill haul road, a distance of approximately 1,300 feet, and from the haul road to the site exit, a distance of approximately 2,300 feet. This measure by itself provides substantial dust mitigation.

Potential dust emissions generated by vehicular traffic on the paved roads and areas will be mitigated by use of a sweeper truck and by watering with a mobile pressurized water truck. In general, the water truck will water the roads and other areas at regular intervals during daily operations, as weather conditions dictate. Chrin uses the sweeper truck both on internal paved roads at the landfill and on Industrial Drive. The primary objective of these measures will be to reduce the dust loading on the traveled portions of paved facility roadways and the adjoining public street. Paved road watering and sweeping operations will be recorded in the facility logs. If dust emissions from unpaved roadways become excessive, Chrin Landfill will pave additional sections of road to decrease these emissions.

Potential dust emissions from unpaved shoulders and unpaved haul roads will also be controlled by watering with mobile water trucks. In general, all unpaved areas which are traveled by operational traffic will receive water to suppress dust on a regular basis, as weather conditions dictate. Unpaved road watering operations will be recorded in the facility logs.

NUISANCE MINIMIZATION AND CONTROL PLAN (Continued)

4.5 Noise

The primary methods available to mitigate noise include reducing the noise energy generated at the source, isolating the source, or increasing the attenuation or absorption between the source and listener. Chrin Landfill intends to use each of these methods to some degree to mitigate noise.

4.5.1 Noise Reduction at Source

To minimize the noise generated by waste handling equipment, Chrin Landfill will continue to perform routine maintenance to keep machinery functioning properly. This includes verifying that muffler systems are intact and functioning, that moving parts are lubricated, worn parts are replaced, and brake systems are in good condition. Chrin has previously conducted noise level monitoring at the landfill working face to assure that noise level exposures for their employees were within allowable OSHA limits.

Presently, permitted hours of operation allow Chrin Landfill to conduct landfill operations from 6:00 a.m. to 6:30 p.m., Monday through Friday and from 6:00 a.m. to noon on Saturday. However, waste acceptance at the facility typically ends at 3:30 p.m. on weekdays.

4.5.2 Isolation and Absorption of Noise Source

Separation distance between the landfill and adjacent residences will mitigate noise. A noise survey was prepared for Chrin Landfill in 2003 to evaluate noise levels on and off-site to determine if separation distances from the landfill to the adjacent residences were sufficient to effectively mitigate waste disposal-related noise.

Measurements of noise were recorded at various locations on the landfill, and areas adjacent to the landfill, using a CEL-254 digital sound meter. Twelve different sampling locations were monitored to develop minimum, maximum, and average decibel levels at each sampling location during active landfill operations (approximately 12:30 p.m. to 3:15 p.m.). In addition, three of the sampling locations near residences were monitored a second time after landfill operations had ended (approximately 4 p.m.) to gauge the effect of landfill operations and measure background noise levels at these locations. Noise measurements were obtained at 15-second intervals, over a 5-minute period at each sampling location. On-site noise sources included a full complement of landfill vehicles (trucks, compactors, articulating dump trucks, and bulldozers).

The noise survey measured background noise levels for properties situated along residential roads with only local traffic ranging from 55 to 65 decibels, and for properties located along main roads with truck traffic ranging from 68 to 80 decibels.

NUISANCE MINIMIZATION AND CONTROL PLAN
(Continued)

Based on the study, several conclusions can be drawn.

- A representative noise level generated on-site at the working face is about 80 decibels for landfill equipment;
- On-site noise levels decrease with increased separation from the noise source. The size of Chrin Landfill provides significant distance buffers to substantially attenuate noise generated at the working face. The background on-site noise level, measured approximately 1,000 feet away from the working face, is approximately 60 decibels;
- Roadway traffic along Industrial Drive, Morvale Road, and Interstate Highway 78 are a significant source of constant noise during the day. Noise measurements taken along these roads were similar to the background noise level measured on the landfill;
- The increased noise levels on Industrial Drive, Morvale Road, and Interstate Highway 78 are not a consequence of landfill operations, as evidenced by the background noise level measurements recorded near the intersection of Industrial Drive and Morvale Road and the intersection of Industrial Drive and Morgan Hill Road. The background noise levels at these locations were slightly higher than the noise levels at these locations during active landfill operations;
- Noise levels measured along Industrial Drive, Morvale Road, and Interstate Highway 78 were consistent with typical background noise levels reported in the literature for major and local roads; and
- Noise levels measured at the closest off-site residences were moderate to very low, depending on their proximity to nearby streets and roads. Overall, noise will be substantially to fully mitigated primarily by separation distance. This is demonstrated by the separation distance needed to reach background levels within the landfill (approximately 1,000 feet).

**NUISANCE MINIMIZATION AND CONTROL PLAN
(Continued)**

5.0 COUNTERMEASURES FOR A NUISANCE EVENT

Adequate countermeasures for a nuisance event are outlined in section 2.0 of this Nuisance Minimization and Control Plan (Plan) and are summarized in Table 2, Nuisance Response Options. A list of emergency response equipment is included with this Plan as Table 3. The procedures outlined in Section 2.0 of this plan are designed to sufficiently mitigate any landfill-related nuisance event.

TABLES

**TABLE 1
CHRIN BROTHERS SANITARY LANDFILL
NUISANCE MINIMIZATION AND CONTROL PLAN
SCHEDULE OF NUISANCE MONITORING**

Nuisance	Nuisance Inspection Item	Person(s) Responsible	Frequency of Inspection
Litter	Blowing Litter at Working Face	Site Foreman Working Face Operators	Daily
	Litter in Perimeter Litter Control Fences	Site Foreman Working Face Operators	Weekly
	Litter Beyond Landfill Disposal Perimeter	Engineer Site Foreman Technician	Weekly
	Daily Cover on Working Face	Engineer Site Foreman	Daily
	Working Face Garbage Odors	Working Face Operators	Daily
	Working Face Gas Odors	Working Face Operators	Daily
Odors	Perimeter Landfill Access Road Odors	Engineer Site Foreman Technician	Daily
	Offsite Odors	Engineer	Daily
	Leachate Seeps	Technician	Daily
Dust	Dust on Access Roads	Engineer Site Foreman Technician	Daily
	Dust From Crushing Operations	Site Foreman Crushing Operator	Daily
Vectors	Presence of Vectors (i.e. birds, rodents)	Engineer Site Foreman Working Face Operators Technician	Daily
Noise	General Noise Survey	Engineer Site Foreman Technician	As Needed

Note: The Operations Manager may perform the duties of the Engineer as needed.

**TABLE 2
CHRIN BROTHERS SANITARY LANDFILL
NUISANCE MINIMIZATION AND CONTROL PLAN
NUISANCE RESPONSE OPTIONS**

Nuisance	Nuisance Identification	Typical Response	Available Nuisance Response
Litter	Blowing Litter at Working Face	● ● ● ● ● ● ● ●	Water Trucks at Working Face
	Litter in Perimeter Litter Control Fences	● ● ● ● ● ● ● ●	Reduce Size of Working Face Deploy Landfill Pickers
	Litter Beyond Landfill Disposal Perimeter	● ● ● ● ● ● ● ●	Additional Daily Cover as needed Minimize Truck Cleanout Area Install Additional Litter Fences
	Daily Cover on Working Face	● ● ● ● ● ● ● ●	
Odors	Working Face Garbage Odors	① ② ③ ④ ⑤	① Water Trucks with Odor Control ② Utility Flare ③ Odor Control Mistlers
	Working Face Gas Odors	② ⑦	④ Special Notification and Disposal Procedures for Nuisance Loads ⑤ Additional Daily Cover
	Perimeter Landfill Access Road Odors	② ⑦	⑥ Side Slope Compaction of Intermediate Cover ⑦ Inspect Gas Well Field for Damaged Heads, Flex Lines, Water Slugs, etc.
	Offsite Odors	③ ⑤ ⑥ ⑦	⑧ Leachate Seep Inspection
	Leachate Seeps	⑧	
Dust	Dust on Access Roads	● ● ● ● ● ● ● ●	Water Trucks for Dust Control On Perimeter Roads Spray Nozzle Inspection for Crusher Dust Control
	Dust From Crushing Operations	● ● ● ● ● ● ● ●	Crushed Aggregate on Working Face Approach for Mud Control on Vehicle Tires for Dust Control Sweeper Use on Access Roads, Onsite and Offsite Paving of Access Roads to Working Face as Needed
Vectors	Presence of Vectors (i.e. birds, rodents)	● ● ● ● ● ● ● ●	Canon and Pistol Outside Exterminator
Noise	General Noise Survey	① ② ● ● ● ● ● ● ● ●	① Vehicle Maintenance and inspection for noise ② Enforce Speed Limit (15 mph)

**TABLE 3
CHRIN BROTHERS SANITARY LANDFILL
NUISANCE MINIMIZATION AND CONTROL PLAN
EMERGENCY EQUIPMENT TABLE**

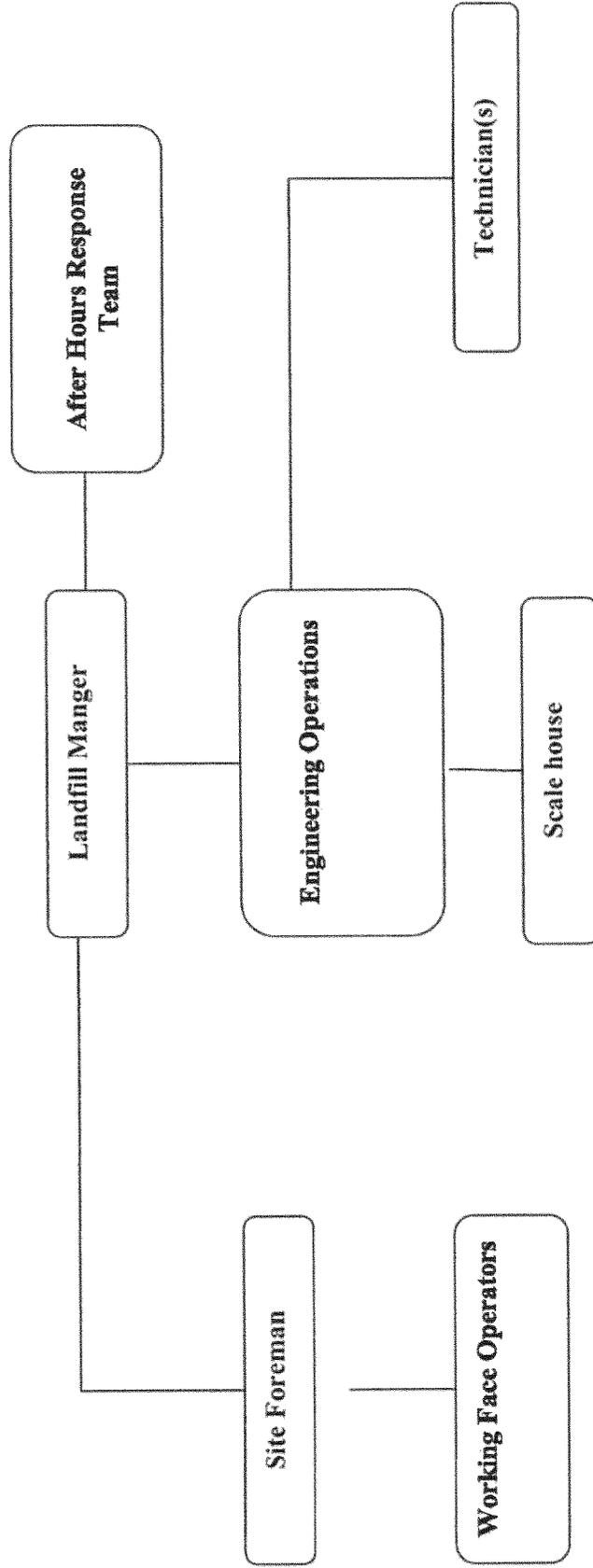
Description	Location	Capabilities
Fire Extinguisher	Scale House, Maintenance Building	Fire Control Vehicles (A, B, and C Types)
First Aid Kit	Scale House, maintenance, vehicles	Minor injuries
Fuel Supply	<ul style="list-style-type: none"> • 500-fallon diesel fuel truck • 500-gallon gasoline 	Fire Control Equipment
Gas Mask	Scale House	Volatile Compounds Protection
Jacks	Maintenance Building	
Protective Clothing <ul style="list-style-type: none"> • Gloves • Face Shields • Rain Suits <ul style="list-style-type: none"> • Boots • Goggles • Dust Masks • Respirators 	Maintenance Building, Landfill Facility	Personal Protection
Telephone	Landfill Office	Summon outside assistance
Radio (mobile)	Landfill Office	Internal communication
Submersible Pump (portable)	Landfill Office	
Emergency Tool and Patch Kits	Maintenance, Vehicles	Equipment repair
Earth Moving Equipment	Working face and construction areas	Waste control clean-up, fire control
Water Truck	Area by office	Dust control, fire control (5,000 gallons)
Gas Monitoring/Detection Equipment	Scale House	Detect gas (carbon monoxide, methane)
Self-Contained Breathing Units (one-hour rating minimum)	Scale House	Personnel air protection
Welding/cutting equipment	Maintenance Building	
HDPE Containers	Maintenance Building	for Temporary/Emergency Storage of Spilled Material
Absorbents	Maintenance Building	Contain/clean up oil spills
Eye Wash Fountain	Maintenance Building	
Safety Shower	Maintenance Building	
Potable Water	Maintenance Building	
Flares, Flashlights, Lanterns	Maintenance Building	

APPENDIX A

**CHRIN BROTHERS SANITARY LANDFILL
ORGANIZATIONAL FLOW CHART**

**CHRIN BROTHERS SANITARY LANDFILL
NUISANCE MINIMIZATION AND CONTROL PLAN**

ORGANIZATIONAL FLOW CHART



APPENDIX B
NOTIFICATION LIST

NOTIFICATION LIST

Williams Township and its Host Inspector should be notified in the event of significant odor issues, flare outages, and/or spills. The following list of agencies and telephone numbers will be used in the event of an emergency as determined by the Primary Emergency Coordinator:

Pennsylvania Department of Environmental Protection

During working hours (570) 826-2511
24-hour contact (570) 826-2511

Pennsylvania Emergency Response Agency

24-hour contact (717) 783-8150

National Response Center

(800) 424-9300

Chemtrec

(800) 424-8802

Poison Control Center

24-hour contact (215) 386-2100

U.S. Environmental Protection Agency

24-hour contact (215) 597-9898

Pennsylvania State Police

Belfast Barracks (610) 759-6106

Northampton County

Health Department (610) 250-1825
Communications (610) 330-2200

Williams Township Fire Department

911 or (610) 330-2200

Ambulance

Easton Hospital (610) 250-4002
Williams Township 911

Williams Township Host Inspector(s)

Rich Adams (610) 258-0522
Joe Black (610) 216-8356

Williams Township

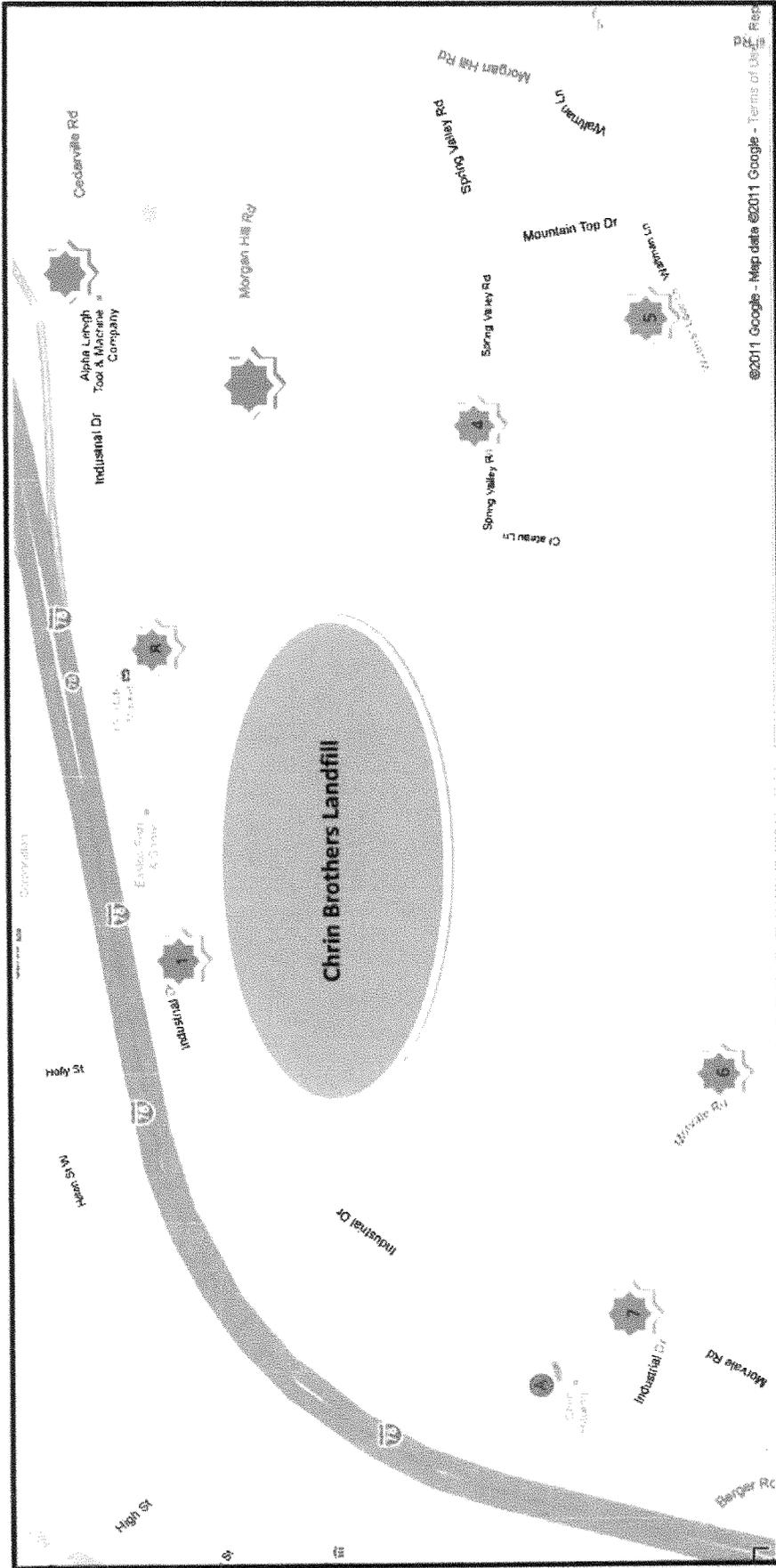
(610) 258-6788

Easton Area Joint Sewer Authority

Industrial Pretreatment Coordinator (610) 250-6706
24-hour contact (610) 250-6705

This list is to be posted at all telephones in the facility.

APPENDIX C
ODOR PATROL ROUTE



Odor Patrol Monitoring Points

1. Main Chrin Landfill Entrance at Industrial Drive
2. Intersection of Industrial Drive and Morgan Hill Road
3. Morgan Hill Road Switchback Curve
4. Spring Valley Road
5. Waltman Loop Lane
6. Intersection of Morvale Road and Industrial Drive
7. Chrin Brothers Landfill
8. Chrin Landfill Maintenance Gate at Industrial Drive

Odor Patrol Map - Aerial



APPENDIX D
ODOR PATROL LOG

APPENDIX E

NUISANCE LOAD MANAGEMENT FACT SHEET



August 9, 2011

To: Haulers & Generators
From: Joe Klobusicky
Subject: Nuisance Loads Policy

CHRIN BROTHERS, INC.

PLEASE NOTE THE FOLLOWING:

In order to prevent any potential nuisance situation at the Chrin Brothers' Landfill, We ask that you take the following steps --

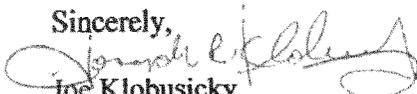
1. Tell your drivers to notify the landfill, prior to arrival, if they are bringing in a load that may cause a potential nuisance situation due to odors (e.g. sludge, slurries and other material generated in municipal wastewater collection and treatment, and food waste loads), dust, litter, etc. For example, if we are notified prior to arrival of a food waste load coming from a grocery store, we can have the disposal area ready to accept the load promptly upon arrival. Prior notice allows us to make the necessary preparations to assure the inspection and disposal of the load quickly to avoid any potential nuisance.
2. Tell your drivers to notify the scale operator, upon arrival at the landfill, that they are bringing in a potential nuisance load.
3. When the weather is hot, you should pull grocery store compactors and other compactors holding food waste more frequently to minimize odors.
4. If you haul sludge, you should consider more lime stabilizing or neutralizer to prevent or correct any odor problem.

Any malodorous load received at the landfill will be treated with a 'Deodorizing Neutralizer,' at an additional charge to the customer of at least \$75.00 per incident.

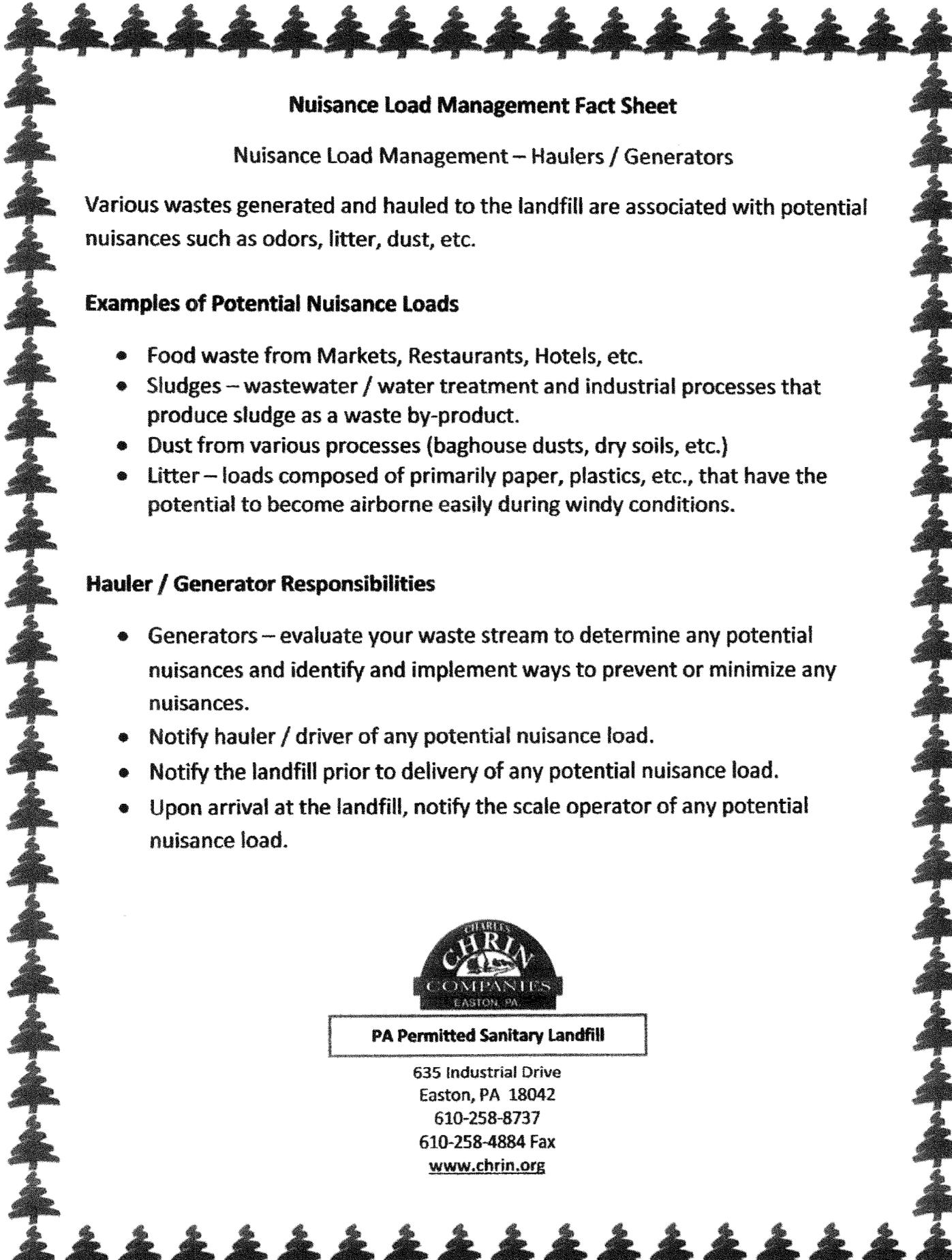
We appreciate your attention to this matter and all of your efforts to help prevent any nuisance conditions at the landfill. Any NOV (Notice of Violation) associated with nuisance loads issued to the landfill could affect our landfill permit.

Thank you in advance for your cooperation. We are confident that you can appreciate our interest in operating and maintaining our facility at the highest standards.

Sincerely,


Joe Klobusicky
Chrin Brothers' Landfill

635 Industrial Drive, Easton, Pennsylvania 18042
610-258-8737—Fax 610-258-4884



Nuisance Load Management Fact Sheet

Nuisance Load Management – Haulers / Generators

Various wastes generated and hauled to the landfill are associated with potential nuisances such as odors, litter, dust, etc.

Examples of Potential Nuisance Loads

- Food waste from Markets, Restaurants, Hotels, etc.
- Sludges – wastewater / water treatment and industrial processes that produce sludge as a waste by-product.
- Dust from various processes (baghouse dusts, dry soils, etc.)
- Litter – loads composed of primarily paper, plastics, etc., that have the potential to become airborne easily during windy conditions.

Hauler / Generator Responsibilities

- Generators – evaluate your waste stream to determine any potential nuisances and identify and implement ways to prevent or minimize any nuisances.
- Notify hauler / driver of any potential nuisance load.
- Notify the landfill prior to delivery of any potential nuisance load.
- Upon arrival at the landfill, notify the scale operator of any potential nuisance load.



PA Permitted Sanitary Landfill

635 Industrial Drive
Easton, PA 18042
610-258-8737
610-258-4884 Fax
www.chrin.org